

**FEDERAL PUBLIC DEFENDER**

Southern District of Florida

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March 28, 2025

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Assistant United States Attorney  
Southern District of Florida  
99 NE 4th Street, Suite 826  
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Re: *United States v. Ryan Routh*  
Case No. 24-cr-80116-AMC

Dear Mr. Shipley,

Pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C), Southern District of Florida Local Rule 88.10(o)(3), and the Court's Order Establishing Pretrial Deadlines (D.E. 91), Mr. Routh provides the following synopsis of defense expert witness testimony of Michael A. McClay.

Mr. McClay would testify from his weapons and tactical expertise and training regarding the alleged assailant's activities and positioning. He would testify regarding the observation point, including its vantage point, obstructed and non-obstructed views, positioning of potential target, impact of target movement, concealment, coverage provided from the plates in the tote bag and backpack, selection, reconnaissance, measurement, line of sight angles, obstructions, potential deflection, terrain, selection, measurement, sustainment, positioning of vehicle, ability to retreat, ability to fire this type of semi-automatic rifle, body positioning, and factors that could affect a shot. Regarding the capacity of the weapons system seized from the crime scene, Mr. McClay would testify of the rifle's operation with this scope, including proper setting of a scope, proper materials for scope mounting, ability for scope mounting and removal, impact of scope mounting and removal on rifle, scope

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adjustment, magnification levels and their function for enlargement at distance and surrounding field of vision, necessity and hindrance of scope use, use of paper attachments to the scope optics, quality of materials attached to the rifle, potential impact of firing to scope, purpose and ability of use of iron sights, quality of ammunition stored, caliber, firing capacity, standard deviation, potential mechanical impacts of a rifle's ability to fire. The rifle, in its state at the scene of the alleged offense, would not have been the optimal precision sniper tool. A sniper would choose a precise, accurate weapon and not utilize the additions to the rifle of the silicone/putty, wrapper optic shroud, hose clamps, and the scope itself without a proper mounting bracket. These variables risk the scope to be "out of zero."

Pending the Defense Motion for Independent Testing of the rifle, Mr. McClay would testify to the results of such testing, such as operability, defects, and distance accuracy. Mr. McClay's statement of qualifications is attached. He has not testified in the past four years as an expert at trial or by deposition.

Sincerely,



*Renee Sihvola*

Assistant Federal Public Defender  
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Southern District of Florida